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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF
)	CAMERON MARTINEZ
U.S. DEPARTMENT OF EDUCATION and)	
Suzanne GOLDBERG, in her official capacity as)	
Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Cameron Martinez, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
3. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
4. Building an affirming community at my college/university/alma mater is a religious exercise for me.

5. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Cameron Martinez
Cameron Martinez

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF JOANNA
)	MAXON
U.S. DEPARTMENT OF EDUCATION and)	
Suzanne GOLDBERG, in her official capacity as)	
Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Joanna Maxon, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
6. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Joanna Maxon

Joanna Maxon

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF DARREN
)	MCDONALD
U.S. DEPARTMENT OF EDUCATION and)	
Suzanne GOLDBERG, in her official capacity as)	
Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Daren McDonald, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Darren McDonald
Darren McDonald

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF FAITH
)	MILLENDER
U.S. DEPARTMENT OF EDUCATION and)	
Suzanne GOLDBERG, in her official capacity as)	
Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Faith Millender, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
3. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
4. Building an affirming community at my college/university/alma mater is a religious exercise for me.

5. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Faith Millender

Faith Millender

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF JAKE
)	PICKER
U.S. DEPARTMENT OF EDUCATION and)	
Suzanne GOLDBERG, in her official capacity as)	
Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Jake Picker, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
4. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.

5. Building an affirming community at my college/university/alma mater is a religious exercise for me.
6. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Jake Picker

Jake Picker

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF MEGAN
)	STEFFEN
U.S. DEPARTMENT OF EDUCATION and)	
Suzanne GOLDBERG, in her official capacity as)	
Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Megan Steffen, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Megan Steffen

Megan Steffen

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF DANIEL
)	CHRISTOPHER TIDWELL-
U.S. DEPARTMENT OF EDUCATION and)	DAVIS
Suzanne GOLDBERG, in her official capacity as)	
Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Daniel Christopher Tidwell-Davis, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Daniel Christopher Tidwell-Davis
Daniel Christopher Tidwell-Davis

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF JUSTIN
)	TIDWELL-DAVIS
U.S. DEPARTMENT OF EDUCATION and)	
Suzanne GOLDBERG, in her official capacity as)	
Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Justin Tidwell-Davis, declare:

1. I believe that my sexuality and gender identity are gifts inherent to all people and are to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a sacred union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a moral imperative for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious freedom(s) as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Justin Tidwell-Davis

Justin Tidwell-Davis

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 6:21-cv-00474-AA
Plaintiffs,)	
v.)	DECLARATION OF LUCAS
)	WILSON
U.S. DEPARTMENT OF EDUCATION and)	
Suzanne GOLDBERG, in her official capacity)	
as Acting Assistant Secretary for Civil Rights,)	
U.S. Department of Education,)	
)	
Defendants.)	

I, Lucas Wilson, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. When I started at my college/university, I believed that being LGBTQ+ was sinful but I changed that religious belief while at college/university.
3. I believe that marriage is a holy union and that it includes same-sex couples.
4. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.

5. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.
6. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
7. Building an affirming community at my college/university/alma mater is a religious exercise for me.
8. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Lucas Wilson

Lucas Wilson

Paul Carlos Southwick (OSB 095141)
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)

Plaintiffs,)

v.)

U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)

Defendants.)

Case No. 6:21-cv-00474-AA

**DECLARATION OF AUDREY
WOJNAROWISCH**

I, Audrey Wojnarowisch, declare:

1. I believe that my sexuality and gender identity are gifts from God to be celebrated and expressed.
2. I believe that marriage is a holy union and that it includes same-sex couples.
3. I endured spiritual abuse while at my religious college/university because the beliefs and practices of my college/university regarding sexuality and gender identity attacked and undermined my own religious beliefs about myself and other LGBTQ+ people.
4. My religious beliefs require me to reject internalized and externalized homophobia and transphobia.

5. My religious beliefs call on me to protect LGBTQ+ students at my college/alma mater from abuse, violence, and oppression.
6. Building an affirming community at my college/university/alma mater is a religious exercise for me.
7. The religious exemption to Title IX creates/created a government-imposed burden on my religious beliefs as described in my Declarations and the First Amended Complaint.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 28th day of July, 2021.

By: s/ Audrey Wojnarowisch

Audrey Wojnarowisch